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July 28, 2023

VIA ECF

Honorable Naomi Reice Buchwald
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Rina Oh n/k/a Rina Oh Amen v. Virginia L. Giuffre*
Case No.: 1-21-cv-08839 (NRB)

Your Honor:

I am the attorney for the plaintiff in the above referenced matter. This letter is respectfully submitted to the Court, on the consent of Kathleen R. Thomas, Esq. and Jill Roth, Esq., attorneys for the defendant, as a Joint Status Report for this proceeding pursuant to this Court's Order dated April 26, 2023 (Dkt. 49).

To date pre-deposition discovery is complete, the parties have been deposed along with three non-party witnesses. Additionally, an independent medical examination of the defendant has been completed. Defendant was furnished with responses to her post-deposition demands and was also provided with HIPAA compliant medical authorizations. Defendant is currently reviewing the responses for deficiencies. Plaintiff's post-deposition demand consisted of a request for admissions. Defendant has indicated that a response will be provided by August 4, 2023. The only other matters that remain outstanding are four non-party subpoenas. One subpoena was served by the plaintiff to obtain her Twitter account records. The second subpoena was served by the defendant on SONY records. The remaining two subpoenas were served by the defendant for non-party depositions. Expert disclosures are on track to be completed pursuant to the amended case management plan.

Thank you for your consideration.

Respectfully submitted,
/s/ Alexander Dudelson
Alexander M. Dudelson

cc:

Via ECF

Kathleen R. Thomas, Esq.
Jill Roth, Esq.